

Bacteriological Standards Changes, S.C. R.61-68

Comments Andy Yasinsac; May 25, 2011

I would like to comment on the proposed changes to the bacteriological stream standards stated in S.C. Water Classifications and Standards, S.C. R.61-68.

While the change to the reference organism for standards and the specific numbers stating the standards, as proposed appear reasonable, a major shortcoming of the proposal is that it fails to set a daily maximum value for bacteria. The use of geometric mean to evaluate compliance allows extremely large numbers in a single discharge to still comply with the standard. For example for five analyses being compared to a monthly average of 126 bacterial units per 100 ml, if four analyses are each 50 units per 100 ml, then the fifth analysis could be more than 5000 units per 100 ml. This is far beyond a safe concentration of bacteria. Therefore, the standard should include a maximum concentration of no more than 1000 bacterial units in any one analysis.